

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

GREAT LAKES INSURANCE SE,	)	
	)	
Plaintiff,	)	
	)	Case No. CIV-22-00702-JD
vs.	)	Judge Jodi W. Dishman
	)	
FREDY VALLE d/b/a VALLE	)	
TRUCKING;	)	
SILVER STAR CONSTRUCTION	)	
COMPANY, INC.;	)	
TYLON MACKEY;	)	
ISRAEL JUAREZ;	)	
ORD TRUCKING, INC.	)	
ZURICH AMERICAN INS. CO.,	)	
	)	
Defendants,	)	
	)	
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ZURICH AMERICAN INS. CO.,	)	
	)	
Defendant/Third Party	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
PROGRESSIVE NORTHERN INS.	)	
CO.,	)	
	)	
Third-Party Defendant.	)	

**UNOPPOSED MOTION TO EXTEND DISPOSITIVE  
AND DAUBERT MOTION DEADLINE**

Plaintiff Great Lakes Insurance SE (“Plaintiff” or “Great Lakes”) submits its Unopposed Motion to Extend Dispositive and *Daubert* Deadline. In support of this Motion, the Parties would show the Court as follows:

1. On May 11, 2023, this Court entered a Scheduling Order in this matter. *See* Doc. #56.

2. The parties have continuously conducted discovery in this matter in good faith and continue to do so.

3. The Scheduling Order lists the dispositive and *Daubert* motions deadline for November 7, 2023.

4. On October 23, 2023 Plaintiff's counsel began what was supposed to be a two day trial in Oklahoma County on an adoption matter. The trial unexpectedly ended on October 31, 2023, nearly a week longer than anticipated. Plaintiff's other attorney is currently observing COVID-19 guidelines due to an exposure.

5. Based on the foregoing, Plaintiff requests a two-week extension to the dispositive and *Daubert* motion deadline.

6. Plaintiff's counsel has conferred with all counsel, and there is no objection to this Motion if the extension applies to all parties.

7. Plaintiff has not made any previous requests to extend the Scheduling Order deadlines in this case.

8. This extension is not sought for the purpose of delay but to provide the Parties sufficient time to complete any dispositive and *Daubert* motions.

9. This Motion is made in the interest of justice and to allow the proper preparation of this case, and not for the purpose of delay or to unduly burden the Court's docket.

10. The granting of this Motion will not cause prejudice to any party hereto nor

will it cause any change to the Court's docket or delay in the Court's hearing of this matter.

WHEREFORE, Plaintiff requests the Court grant its Motion and extend the dispositive and *Daubert* deadline two weeks, or from November 7, 2023 to November 21, 2023.

Respectfully submitted,

/s/ Emily E. Allan

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*Attorneys for Defendant*

### **CERTIFICATE OF FILING**

I hereby certify that on November 1, 2023 I electronically filed the foregoing Final Exhibit List the Clerk of the U.S. District Court, Western District of Oklahoma, using the electronic case filing system of the Court.

By: /s/ Emily Allan